

**FILED**

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO**UNITED STATES DISTRICT COURT**

for the

District of New Mexico

DEC 18 2012

er

United States of America

v.

Thomas JONES

**MATTHEW J. DYKMAN**

CLERK

Case No.

12mj3173

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 17, 2012 in the county of McKinley in the  
District of New Mexico, the defendant(s) violated:*Code Section**Offense Description*21 USC 841 (a)(1)(b)(1)(A) and  
21 USC 846Title 21, United States Code, §841 Possession with the Intent to Distribute  
500 grams and more of a mixture and substance containing  
Methamphetamine; and Title 21 United States Code §846, Conspiracy.

This criminal complaint is based on these facts:

Please see attached.

Continued on the attached sheet.

Abbey E. Kepf*Complainant's signature*ABBEY E. KEPF, SPECIAL AGENT*Printed name and title*

Sworn to before me and signed in my presence.

Date: 12-18-12Robert H. Scott*Judge's signature*City and state: ALBUQUERQUE, NEW MEXICOROBERT HAYES SCOTT*Printed name and title*UNITED STATES MAGISTRATE JUDGE

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA, )  
 )  
 V. )  
 )  
 Terrence CONNORS )  
 )  
 and )

Thomas JONES

**AFFADAVIT OF HSI SPECIAL AGENT ABBEY KEPF**

The Affiant, Special Agent Abbey Kepf, from the Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (HSI) being first duly sworn, hereby state as follows:

**I. INTRODUCTION**

1. Your Affiant has been employed by Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) since March 27, 2011. Prior to employment with HSI, your Affiant was employed as a Criminal Investigator with the United States Department of Labor, Office of Labor-Management Standards from January 2006 to March 2011. Your Affiant is currently assigned to the Assistant Special Agent in Charge, Albuquerque, New Mexico office where your Affiant's duties include the investigation of individuals possessing controlled substances including violations of Title 21, United States Code, §841 Possession with the Intent to Distribute 500 grams and more of a mixture and substance containing Methamphetamine; and Title 21 United States Code §846, Conspiracy.
2. During this time, your Affiant has successfully completed twelve weeks of Criminal Investigator training at the Federal Law Enforcement Training Center (FLETC). In addition, your Affiant completed nine weeks of Special Agent training with ICE, also at FLETC.
3. Based on the facts contained herein, your Affiant believes there is probable cause to support a criminal complaint and arrest warrant against Terrence CONNORS (Year of Birth:1953) and Thomas JONES (Year of Birth:1971) for violation of Title 21, United States Code, § 841 (a)(1) and (b)(1)(A), to wit; Possession with the Intent to Distribute 500 grams and more of a mixture and substance containing Methamphetamine and Title 21 United States Code §846, Conspiracy.

## AFFIDAVIT FOR CRIMINAL COMPLAINT AND ARREST WARRANT – (CONTINUED)

4. The statements contained in this affidavit are based upon your Affiant's investigation, training, experience, and information provided by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, your Affiant has not included each and every fact known to me concerning this investigation. Your Affiant has set forth only the facts that your Affiant believes are necessary to establish probable cause to support a criminal complaint against Terrence CONNORS and Thomas JONES, in violation of 21 U.S.C. § 841, and Title 21 United States Code §846, Conspiracy.

**II. RELEVANT STATUTES**

5. This investigation concerns alleged violations of 21 U.S.C. § 841 (a) (1) and (b) (1) (A), and Title 21 United States Code §846, Conspiracy.
6. 21 U.S.C. § 841 (a) (1) and (b) (1)(A) prohibits any person to knowingly or intentionally manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, 500 grams and more of a mixture and substance containing Methamphetamine

**III. DETAILS OF INVESTIGATION**

7. On or about December 17, 2012, HSI agents verified through Thrifty Rental Car that CONNORS and a male identified as Thomas JONES rented a 2013 Hyundai Elantra, bearing New Mexico license plate 908-RXG, earlier that day. According to the rental car agreement, CONNORS was listed as the primary driver and JONES was listed as a secondary driver of the rental car. The vehicle was scheduled to be returned to Thrifty on December 19, 2012.
8. On or about December 17, 2012, HSI and Region II narcotics agents encountered CONNORS and JONES traveling eastbound on Interstate 40 near Gallup, New Mexico, within the aforementioned rental vehicle and positively identified CONNORS as the passenger in the vehicle. Region II narcotics agents previously secured a State of New Mexico arrest warrant for CONNORS. Agents conducted a traffic stop on Interstate 40 Eastbound mile marker 22 to execute the arrest warrant.
9. On or about December 17, 2012, a Region II Narcotics canine positively alerted on the rental vehicle occupied by CONNORS and JONES. A search of the vehicle was conducted by agents. Agents located a small glass pipe with a white crystal-like residue under the driver's seat of the vehicle, which was previously occupied by JONES. JONES was also found with a user amount of suspected methamphetamine in his front coat pocket. Agents located two bundles of a white crystal-like substance wrapped in plastic wrap and duct tape concealed in black socks found in a blue bag in the rear seat and a Glock 17 pistol, within a black bag in the rear seat of the vehicle. The white crystal like substance was later tested for

AFFIDAVIT FOR CRIMINAL COMPLAINT AND ARREST WARRANT – (CONTINUED)

properties of methamphetamine. The test yielded positive results. In total, the bundles weighed approximately 990.37 grams.

10. On or about December 17, 2012, your affiant read CONNORS his Miranda Rights, which he stated he understood and waived. CONNORS stated that he has been selling methamphetamine for approximately one year and that he purchased the methamphetamine found within the blue bag earlier in the day from a Mexican national female in the Phoenix area. CONNORS also stated that the Glock 17 pistol was his firearm that he purchased many years ago in Louisiana. CONNORS stated that he had made approximately four trips within the last month with JONES to Phoenix to purchase methamphetamine.
11. On or about December 17, 2012, HSI Special Agents read JONES his Miranda Rights, which he stated he understood and waived. JONES stated that he was paid by CONNORS in methamphetamine to drive CONNORS to and from Phoenix when needed to pick up additional methamphetamine for distribution. JONES stated that it was "his job" and that he drove with CONNORS to Phoenix to pick up methamphetamine approximately four times.

**V. CONCLUSION**

12. Based on all of the foregoing information, your Affiant submits there is probable cause to believe that Terrence CONNORS and Thomas JONES conspired and knowingly and intentionally possessed with intent to distribute 500 grams and more of a mixture and substance containing Methamphetamine

Your Affiant requests a criminal complaint and arrest warrant in this matter.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. FURTHER AFFIANT SAYETH NOT.

Abbey E. Kepf  
Abbey E. Kepf, Special Agent  
Homeland Security Investigations

Sworn to and subscribed before me this 18 day of December 2012 in Albuquerque, New Mexico.

Robert H. Scott  
United States Magistrate Judge